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Attorneys for Plaintiffs,  
 KEITH H. WASHINGTON,  
 SAN FRANCISCO BAY VIEW  
 NATIONAL BLACK NEWSPAPER

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

WASHINGTON, KEITH H. and SAN  
 FRANCISCO BAY VIEW NATIONAL  
 BLACK NEWSPAPER,

Plaintiffs,

vs.

FEDERAL BUREAU OF PRISONS, GEO  
 CALIFORNIA, INC., MONICA HOOK,  
 MARIA RICHARD, WILL GOMEZ and  
 MURTALA LANVAL,

Defendants.

Case No.: 4:21-cv-00787-JST

**DECLARATION OF LISA “TINY”  
 GRAY-GARCIA IN SUPPORT OF  
 MEMORANDUM OF POINTS AND  
 AUTHORITIES IN SUPPORT OF  
 PLAINTIFFS’ APPLICATION FOR A  
 TEMPORARY RESTRAINING  
 ORDER AND/OR ORDER TO SHOW  
 CAUSE AND FOR PRELIMINARY  
 INJUNCTION**

Judge: Hon Jon S. Tigar  
 Location: Courtroom 6 – 2nd Floor  
 Date: March 10, 2021  
 Time: 9:30 a.m.

I, Lisa “Tiny” Gray-Garcia, hereby declare:

1. I have personal knowledge of the matters stated in this Declaration, and  
 if called and sworn as a witness in this matter, I could and would competently testify  
 thereto.

2. I am the co-founder and co-editor of POOR Magazine.

1           3.       POOR Magazine was started in 1996. It is a poor/indigenous people led  
2 non-profit arts organization dedicated to providing grassroots, revolutionary media  
3 access, arts and education for youth, adults and elders in poverty.

4           4.       POOR Magazine was the primary organizer of a rally in front of UC  
5 Hastings on November 16, 2020, which Keith H. “Malik” Washington attended as  
6 the Editor-in-Chief of the San Francisco Bay View National Black Newspaper (“SF  
7 Bay View”).

8           5.       The rally, entitled the “Stolen Land/Hoarded Resources Tour Thru the  
9 Tenderloin”, was organized to protest the settlement reached between UC Hastings  
10 and the City of San Francisco, under which the City of San Francisco would remove  
11 homeless people from the streets around UC Hastings.

12          6.       The SF Bay View has collaborated closely with POOR Magazine for more  
13 than 20 years.

14          7.       The SF Bay View was one of the official co-sponsors of the rally in front  
15 of UC Hastings on Monday, November 16, 2020.

16          8.       POOR Magazine has a long-standing arrangement with the SF Bay View  
17 under which the SF Bay View is listed as a co-sponsor on all the events we organize.

18          9.       On Friday, November 11, 2020 at 8:21 a.m., POOR Magazine sent out an  
19 draft email announcing the rally in front of UC Hastings on November 16th. I wrote  
20 this email, and was one of the co-signers.

21          10.       A true and correct copy of the November 11, 2020 email is attached as  
22 Exhibit “A”.

23          11.       The November 11, 2020 email lists the SF Bay View newspaper as a co-  
24 sponsor of the event.

25          12.       The November 11, 2020 email contains a quote from Malik about the  
26 plight of homeless people in San Francisco.

27          13.       Malik’s quote was: “I live in the Tenderloin and I witness the despair of  
28 homeless human beings everyday trying desperately to eek out some type of an

1 existence in this unsympathetic city! It seems as if the billionaire Rod Conway has  
2 mesmerized Mayor Breed with his money and influence. There is a war being waged  
3 against the homeless in San Francisco and the Tenderloin is on the front line of that  
4 battle. Get off your butt and join us! Dare to struggle, dare to win, all power to the  
5 people.”

6 14. After the quote, Malik is identified as “Malik Washington, San Francisco  
7 Bay View Newspaper”.

8 15. On November 13, 2020 at 10:20 a.m., a copy of the November 11 email  
9 was sent out to a public distribution list announcing the rally on November 16.

10 16. A true and correct copy of the November 13, 2020 email is attached as  
11 Exhibit “B”.

12 17. The rally took place on Monday, November 16 from approximately 3:00  
13 p.m. to 5:00 p.m. Malik Washington attended this event as a media producer and  
14 editor of the SF Bay View newspaper. Malik also reported on the event for the SF Bay  
15 View.

16 18. During the event, one of the organizers asked each of the co-sponsors of  
17 the event if they wished to speak. Malik Washington addressed the crowd for a few  
18 minutes.

19. Malik Washington spoke at the rally in his role as the editor of the SF Bay View.

I declare under penalty of perjury that the foregoing is true and correct, except as to those matters stated on information and belief, and as to those matters I believe them to be true. Executed on February 21, 2021 in San Francisco, California.

Signed: Lisa "Tiny" Gray Garcia\*  
Lisa "Tiny" Gray-Garcia  
(she/her)

\* I, Richard Tan, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that concurrence in the filing of these documents has been obtained from each of its signatories.

**Exhibit A**

From: **deeandtiny** <[REDACTED]>  
Date: Wed, Nov 11, 2020 at 8:21 AM  
Subject: With Maliks Baadass statement added in  
To: Nube Brown <[REDACTED]>, SF Bay View <[REDACTED]>,  
Malik Washington <[REDACTED]>

For Immediate Release  
Press Contacts Leroy Moore or Tiny Garcia-[REDACTED]  
[REDACTED]

## **Houseless & Formerly Houseless, disabled, indigenous youth and elders "Tour" the Tenderloin demanding housing and reparations for 500 houseless San Franciscans facing motel evictions**

Houseless and formerly unhoused people will tour the Occupied Village of Yelamu aka San Francisco's Tenderloin District where UC Hastings hoards Mama Earth while people sleep on the street and the Mayor plans to evict over 500 homeless folks from motels she begrudgingly granted them

**What:** Stolen Land/Hoarded Resources Tour thru the Tenderloin  
**When:** 3pm Monday, Nov 16th  
**Where:** 1st Tour Stop UC Hastings- McAllister & Hyde street-corner - 2nd stop TBA

**The Stolen land/Hoarded Resources Tours, loosely based on the Bhoodan Movement of India launched by Vinoba Bhave who walked through India asking wealthy "land-owners" to gift their land to landless peoples will be sharing a similar vision with SF poltricksters, akkkademik land-stealers & wealth-hoarders who are planning to evict over 500 Houseless mostly disabled, majority Black and Brown elders**

who are currently residing in motels onto the freezing San Francisco streets four days before the holiday.

"This is another example of London Breed's absolute hate for poor and houseless San Franciscans," said Wanda P, one of the houseless elders currently residing in motels who was given notice to leave on Dec 21st

"We evict you, London Breed!" said Leroy Moore, disabled, formerly houseless co-founder of Homefulness and Krip Hop Nation.

"Mayor London Breed begrudgingly granted motel rooms to houseless San Franciscans because of the global pandemic, she never meant for any houseless people to be housed permanently only and the only reason we were in these motels in the first place is because it's dangerous to be unsheltered in a pandemic," said Tommy P. a currently unhoused San Franciscan resident who was already evicted from a motel room in San Francisco.

"Academic institutions like UC Hastings have 'bought' over two blocks of the Tenderloin district in Occupied Yerlamu, (San Francisco), sued the City for its 'homeless problem' and hired private security to 'sweep' houseless residents off the streets around 'their' buildings, which is why we are proposing that UC Hastings give-back one of these hoarded buildings to houseless residents of the Tenderloin so

they can build their own housing like the [Homefulness](#) model and the Mayor cease and desist all evictions until permanent housing is secured, " said "Tiny" Gray-Garcia, formerly houseless, co-founder of POOR Magazine and a resident and co-builder of [Homefulness](#).

"Leadership requires making space for everyone. In a time of COVID on Winter Solstice, Mayor Breed is attempting to turn people out onto the streets without a plan in place. Creating the further dehumanization of people by not acknowledging them as fellow human beings. During this eight months of shelter in place, the leadership had time to create an alternative to the hotel vouchers, if they truly wanted to "fix" the problem. There are no new shelters, no-income/low low income housing built. There is no plan... The worst kind of Grinch, the mentality that was taught out of colonization...Colonization created poverty/Greed and homelessness. Facism creates laws that throw away other human beings and US Hastings is acting just as the royalty and gentry that use laws to sweep away human made conditions. Breed and Hastings Law school are on the wrong side of history. Leaders should create a better way for ALL not create more destruction," Corrina Gould, Indian People Organizing for Change.

On this tour poverty/indigenous/disability skolaz will be sharing actual solutions to homelessness, not more hae and evictions, like the medicine of the [BankofComeUnityReparations'](#) **Homefulness Housing Fund**, funded by folks with hoarded wealth that enables poor and houseless people to "purchase" stolen Mama Earth so they can build their own self-determined housing /healing villages modeled after the Homefulness Project in Oakland.

"We come courageously, upholding our ancestors birthright; we come in peace offering the medicine of Redistribution of stolen land and hoarded resources... Ase" , said Aunti Frances Moore, Formerly Houseless Black Panther, Founder of Self-Help Hunger Program and Co-founder of [Homefuness](#).



"I LIVE IN THE TENDERLOIN AND I WITNESS THE DESPAIR OF HOMELESS HUMAN BEINGS EVERYDAY TRYING DESPERATELY TO EEK OUT SOME TYPE OF AN EXISTENCE IN THIS UNSYMPATHETIC CITY! IT SEEMS AS IF THE BILLIONAIRE ROD CONWAY HAS MESMERIZED MAYOR BREED WITH HIS MONEY AND INFLUENCE. THERE IS A WAR BEING WAGED AGAINST THE HOMELESS IN SAN FRANCISCO AND THE TENDERLOIN IS ON THE FRONT LINE OF THAT BATTLE. GET OFF YOUR BUTT AND JOIN US!!! DARE TO STRUGGLE, DARE TO WIN, ALL POWER TO THE PEOPLE," said Malik Washington, San Francisco Bay View Newspaper.

We invite ALL fellow land liberators, reparators, CONfused but conscious wealth-hoarders, media producers, poverty skolaz, houseless folks, advocates, revolutionaries. UC students and community to join us.

The concept of [Homefulness](#) and ComeUnity Reparations is explained in the recently released publication the [Poverty Scholarship Book](#).

As with all the previous tours we will be launching with All Nations Prayer for Ancestors and Mama Earth-

Here is an article explaining the Bank of COMEUnity Reparations- is [here](#)

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**Herstory on the Tours:**

**This powerful [nation-wide tour](#) was launched in 2016 in the stolen village of Yelamu (San Francisco's Nob Hill and Pacific Heights neighborhoods) and has so far "toured" wealth-hoarder enclaves such as SillyCon Valley, Beverly Hills, The Hamptons, Park Avenue and the Main Line of Philadelphia to name a few.**

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**"We homeless, working-class, Kaged/criminalized, disabled and 1st Nations people are peacefully crossing the visible and invisible lines that separate us poor folks from the "very rich" to ask them to begin the healing, change-making, process of decolonizing, redistributing and reparating their stolen and/or hoarded, inherited wealth and/or land " Concluded Lisa Tiny Gray-Garcia, formerly houseless co-founder of POOR Magazine and author of Growing Up Homeless in America and the upcoming PeoplesTextBook- Poverty Scholarship - Poor People Theory, Art, Words and Tears Across Mama Earth**

**Two models that Homeless and 1st Nations folks are presenting is the poor people-led self-determined movement called Homefulness in Deep East Oakland (Huchuin Ohlone Land) as well as launch Homefulness movements in every city where unhoused and 1st Nations people dwell as well as the Sogorea Te Land Trust which is a Native Woman run land trust based in the land of the 1st peoples who lead it.**

Co-sponsored by San Francisco Bay View Newspaper, KRIP Hop Nation, Indian People Organizing for Change and more to come.. For organizations who would like to co-sponsor, join us, speak or walk with us - pls email [REDACTED] or just show up at McAllister and Hyde streets at 3pm

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POOR Magazine/PoorNewsNetwork(PNN)

Author of Criminal of Poverty: Growing Up Homeless in America

[www.poormagazine.org](http://www.poormagazine.org)

[YouTube](#) - Subscribe!

[Twitter](#) - Follow

[Facebook](#) - Follow

[www.tinygraygarcia.com](http://www.tinygraygarcia.com)

[www.racepovertymediajustice.org](http://www.racepovertymediajustice.org)

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## **Exhibit B**



SF Bay View

< . > ,

Category	Percentage
Category 1	~85%
Category 2	~90%
Category 3	~85%
Category 4	~90%
Category 5	~75%
Category 6	~80%
Category 7	~85%
Category 8	~90%
Category 9	~80%
Category 10	~95%
Category 11	~80%
Category 12	~85%
Category 13	~90%
Category 14	~95%
Category 15	~95%
Category 16	~90%
Category 17	~85%
Category 18	~95%
Category 19	~95%
Category 20	~95%
Category 21	~90%
Category 22	~95%
Category 23	~90%
Category 24	~95%
Category 25	~90%
Category 26	~95%
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Category 34	~95%
Category 35	~90%
Category 36	~95%
Category 37	~90%
Category 38	~95%
Category 39	~90%
Category 40	~95%
Category 41	~90%
Category 42	~95%
Category 43	~90%
Category 44	~95%
Category 45	~90%
Category 46	~95%
Category 47	~90%
Category 48	~95%
Category 49	~90%
Category 50	~95%

A horizontal bar chart consisting of 30 black bars. The bars are arranged vertically, one above the other. Each bar represents a data point, with its length corresponding to its value. The values are distributed across the range from 0 to 100, with some bars reaching the full width and others being significantly shorter. The bars are solid black and have no labels or titles.

[REDACTED]



A horizontal bar chart consisting of 40 black bars of varying lengths. The bars are arranged vertically, with the longest bars at the top and bottom, and shorter bars in the middle. The lengths vary significantly, with some bars being nearly full-width and others being much shorter. The bars are arranged in a single column, with the longest bars at the top and bottom, and shorter bars in the middle. The lengths vary significantly, with some bars being nearly full-width and others being much shorter.

Tiny <[REDACTED]>, [REDACTED]

For Immediate Release  
Press Contacts Leroy Moore or Tiny Garcia-[REDACTED]  
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